

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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NELLIE SAMPSON,

*on behalf of herself and all other employees similarly  
situated,*

Plaintiffs,

v.

MEDISYS HEALTH NETWORK INC., THE JAMAICA  
HOSPITAL, THE BROOKDALE HOSPITAL  
MEDICAL CENTER, FLUSHING HOSPITAL AND  
MEDICAL CENTER, PENINSULA HOSPITAL  
CENTER, DAVID P. ROSEN, and MAX SCLAIR,

Defendants.  
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**ECF CASE**

10 Civ. 1342 (SJF) (ARL)

**DECLARATION  
OF BRENDA LEE**

I, Brenda Lee, hereby declare as follows based on personal knowledge:

1. I am the Director of Labor Relations for Brookdale Hospital and Medical Center (“Brookdale”).

2. I have been employed by Brookdale since May 1993 and I am familiar with certain of Brookdale’s policies and practices with respect to labor and employee relations, compensation, benefits, human resources administration, staffing and corporate human resources support.

3. Brookdale is a non-profit, community-based hospital that employs approximately 3,500 individuals.

4. I have reviewed the Complaint in the above-captioned litigation, including plaintiff Nellie Sampson’s (“Plaintiff”) description of non-exempt Brookdale employees on whose behalf Plaintiff purports to bring this lawsuit on a class and collective action basis.

Certain current or former Brookdale employees included in Plaintiff’s putative class description

are members of collective bargaining units represented by several labor unions that represent Brookdale employees.

5. The terms and conditions of employment for certain putative class members are governed by a number of different collective bargaining agreements ("CBA").

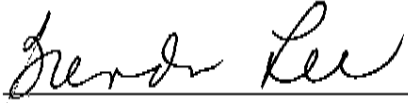
6. The terms and conditions of employment for some of the employees (current and former) in Plaintiff's putative class description are governed by the CBA between Brookdale and the Committee of Interns and Residents/SEIU ("SEIU"). A true and accurate copy of the CBA currently in effect between The Brookdale Hospital Medical Center and SEIU is attached as Exhibit A.

7. The terms and conditions of employment for other current or former Brookdale employees included in the putative class description are governed by a CBA between Brookdale and Brotherhood of Security Personnel, Officers and Guards International ("Brotherhood"). A true and accurate copy of the CBA currently in effect between The Brookdale Hospital Medical Center and Brotherhood is attached as Exhibit B.

8. The terms and conditions of employment for members of a third group of putative class members are governed by a CBA between Brookdale and 1199SEIU United Healthcare Workers East Registered Nurse Division ("SEIU, RN Division"). A true and accurate copy of the CBA currently in effect between The Brookdale University Hospital and Medical Center/Schulman & Schachne Institute for Nursing & Rehabilitation and SEIU, RN Division is attached as Exhibit C.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on July 22, 2010.

  
Brenda Lee